BEFORE THE

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Federal Communications Commission 15 ms

WASHINGTON, D.C. 20554

FEDERAL COMMUNICATIONS SOMMISSION OFFICE OF THE SECRETARY

In the Matter of

Allocation of the 219-220 MHz Band for Use by the Amateur Radio Service ET Docket No. 93-40 RM-7747

REPLY COMMENTS OF WATERWAY COMMUNICATIONS SYSTEM, INC.

Waterway Communications System, Inc. (hereinafter "WATERCOM"), by its attorney, respectfully submits its Reply to the Comments filed in response to the Commission's Notice of Proposed Rulemaking in this proceeding.

Several parties argue that the proposed 100 kHz bandwidth limitation is overly restrictive. WATERCOM notes that as bandwidth increases, the potential for interference also increases. Providing bandwidths greater than 100 kHz well could make it quite difficult to locate and coordinate channels for Amateur use in areas close to the busier port areas served by WATERCOM.

WHEREFORE, THE PREMISES CONSIDERED, Waterway

Communications System, Inc. respectfully urges the Federal

Communications Commission to act consistent with its

Comments and Reply Comments in finalizing this proceeding.

Martin W. Bercovici KELLER AND HECKMAN

1001 G Street, N.W.

Suite 500 West

Washington, D.C. 20001

202-434-4144

Attorney for

Waterway Communications, System, Inc. No. of Copies reco

List ABCDE

Date: July 15, 1993